



March 3, 2020

Via ECF

Magistrate Judge David T. Schultz
United States District Court
9E U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

Re: Fair Isaac Corp. v. Federal Insurance Co., et al.
No. 16-cv-01054-WMW-DTS (D. Minn. Filed April 21, 2016)

Dear Judge Schultz:

In light of the continuing spread of the coronavirus, Federal has taken steps to limit risk to its employees, including travel restrictions. Yesterday, Federal's Chief Executive Officer issued a directive to all employees that "International (including regional cross-border) travel should be limited to critical business needs and must be approved at the regional/global executive level." Federal is committed to doing its part to ensure that its employees are not subjected to unreasonable travel-related risks.

Accordingly, Federal respectfully requests that depositions of employees located outside of the United States, including Claudio Ghislanzoni, Paul Johnston, Runesh Roy, and Andrea Phillips, be continued until Federal's travel restriction is lifted. Alternatively, Federal requests that videotaped depositions of these individuals be allowed.

In addition, Ellen Garnes, a Federal employee in New Jersey, advised us today that she will not travel in the near future due to a recent surgery and the risks of the coronavirus. In July 2019, Ms. Garnes had kidney transplant surgery. In October 2019, she returned to work. In light of her medical condition, and the risks associated with the coronavirus, she is not willing to travel at this time. Therefore, Federal requests that Ms. Garnes be allowed to appear for her deposition by videotape.

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Sincerely,

s/Terrence J. Fleming

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